

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	Cr. No. 16 - 10165
v.)	VIOLATIONS:
1. OSCAR OLIVA, a/k/a "Droopy,")	18 U.S.C. § 371 --
2. RALPH BONANO,)	Conspiracy
3. JAMIR CHICAS-HERNANDEZ,)	
4. LESTER MARTINEZ, a/k/a "Chapin,")	
5. JOSE PINEDA RAMIREZ, a/k/a "Lil Joker,")	21 U.S.C. § 846 --
6. DENNIS PLEITES RAMOS,)	Conspiracy to Distribute Cocaine, and Cocaine Base
7. JOSE RAMOS RIVERA, a/k/a "Pumba,")	
8. LUIS SERRANO, a/k/a "Catracho," a/k/a "Cheeky,")	21 U.S.C. § 841(a)(1) --
9. BRIAN SEGURA,)	Possession with Intent to Distribute and Distribution of Cocaine Base
10. CRISTIAN VELASQUEZ, a/k/a "Bombio," and)	
11. OMAR VILLEGAS, a/k/a "Negrito,")	18 U.S.C. § 922(g)(1)-- Felon in Possession of a Firearm
)	
)	18 U.S.C. § 922(g)(5)-- Alien in Possession of a Firearm
)	
)	18 U.S.C. § 922(k) --
)	Possession of a Firearm with an Obliterated Serial Number
)	
)	28 U.S.C. § 5861(d) --
)	Possession of a Sawed Off Shotgun
)	
)	21 U.S.C. § 853 --
)	Drug Forfeiture Allegation

INDICTMENT

COUNT ONE: **(18 U.S.C. § 371—Conspiracy; 18 U.S.C. § 2 -- Aiding and Abetting)**

The Grand Jury charges that:

1. From a time unknown to the Grand Jury and continuing until on or about June 8, 2016, in Chelsea, Boston and elsewhere in the District of Massachusetts,

1. **OSCAR OLIVA**, a/k/a “Droopy,”
2. **RALPH BONANO**,
4. **LESTER MARTINEZ**, a/k/a “Chapin,”
5. **JOSE PINEDA RAMIREZ**,
a/k/a “Lil Joker,”
6. **DENNIS PLEITES RAMOS**,
7. **JOSE RAMOS RIVERA**, a/k/a “Pumba,”
8. **LUIS SERRANO**, a/k/a “Catracho,” a/k/a
“Cheeky,”
9. **BRIAN SEGURA**,
10. **CRISTIAN VELASQUEZ**,
a/k/a “Bombio,” and
11. **OMAR VILLEGAS**, a/k/a “Negrito,”

the defendants herein, not being a licensed importer, manufacturer and dealer under the provisions of Chapter 44 of Title 18, United States Code, did knowingly conspire with each other, and others known and unknown to the Grand Jury, to commit offenses against the United States, to wit, willfully to engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

OVERT ACTS

2. In furtherance of the conspiracy, the defendants and other co-conspirators known and unknown to the Grand Jury, in the District of Massachusetts and elsewhere, committed the following overt acts, which were sales of firearms:

- a. a Smith and Wesson, .357 Magnum revolver with an obliterated serial number, sold on or about April 21, 2015;
- b. a Ruger, New Model Blackhawk, .357 Magnum revolver, bearing serial number 33-56967, sold on or about April 29, 2015;
- c. a SCCY, CPX-1, .9mm semi-automatic pistol, with an obliterated serial number, sold on or about May 9, 2015;
- d. an Intratec, Tec-9, .9mm pistol, with an obliterated serial number, sold on or about May 20, 2015;
- e. a Remington, 12 gauge, double-barrel shotgun, bearing serial number 57262, sold on or about May 29, 2015;
- f. a Taurus, PT111 G2, 9mm semi-automatic pistol, with an obliterated serial number, sold on or about June 3, 2015;
- g. an H&R Inc., Model 676, .22 caliber revolver, bearing serial number 7AT070686, sold on or about June 5, 2015;
- h. a Ruger, 22/45 MKIII, .22 caliber semi-automatic pistol, bearing serial number 274-85425, sold on or about June 8, 2015;
- i. a Bryco Arms, Bryco38, .380 caliber semi-automatic pistol, with an obliterated serial number, sold on or about June 12, 2015;
- j. a Helwan Brigadier, 1951, .9mm semi-automatic pistol, bearing serial number 11202, sold on or about June 16, 2105;
- k. a Rohm, RG14, .22 caliber revolver, bearing serial number 33836, sold on or about June 18, 2015;
- l. a Llama, IX-C, .45 caliber semi-automatic pistol, bearing serial number C42888, sold on or about June 25, 2015;
- m. a Smith and Wesson, Regulation Police, .32 caliber revolver with an obliterated serial number, sold on or about July 9, 2015;
- n. an Ortgies, .32 caliber semi-automatic pistol, bearing serial number 60023, sold on or about July 23, 2015;
- o. a HiPoint, .45 caliber semi-automatic pistol, bearing serial number X4203573, sold

on or about July 27, 2015;

- p. a Mauser, 7.65mm semi-automatic pistol, bearing serial number 317519, a Remington, Model 740, .308 caliber rifle, bearing serial number 153250, and JC Higgins, Model 5833, 20 gauge shotgun, sold on or about August 15, 2015;
- q. a Hatson Arms, Escort, 12 gauge, pump-action shotgun, bearing serial number 186281, sold on or about September 4, 2015;
- r. a Sig Sauer, Model SP2022 .9mm, semi-automatic pistol, bearing serial number 249133767, sold on or about September 24, 2015;
- s. a Mossberg, 600AT, 12 gauge, sawed-off shotgun, with an obliterated serial number, and a Remington, Model 870, Wingmaster, 12 gauge shotgun, bearing serial number 352474V, sold on or about October 4, 2015;
- t. a High Point, Model CF380, .380 caliber semi-automatic pistol, bearing serial number P889460, sold on or about October 6, 2015;
- u. a Walther, P38, .9mm semi-automatic pistol, bearing serial number 212803, and a Smith and Wesson, SW9VE, .9mm semi-automatic pistol, bearing serial number DXAS004, sold on or about October 16, 2016;
- v. a Smith and Wesson, Model 17, .22 caliber revolver, bearing serial number K96273, and a Smith and Wesson, Regulation Police, .32 caliber revolver, bearing serial number 527363, sold on or about November 17, 2015;
- w. a Bryco Arms, Model Jennings Nine, 9mm semi-automatic pistol, bearing serial number 1459175, sold on or about December 1, 2015;
- x. an Armscor, M200, .38 caliber revolver with an obliterated serial number, sold on or about March 14, 2016;
- y. an Armscor, 1911, .45 caliber, semi-automatic pistol bearing serial number CD008791, sold on or about April 25, 2016;
- z. a Davis Industries, P380, .380 caliber semi-automatic pistol, bearing serial number AP449597, sold on or about April 25, 2016;
- aa. a Smith and Wesson, .38 Special snub-nose revolver, bearing serial number C56093, sold on or about May 17, 2016;
- bb. a Taurus, Revolver Model 851, .38 caliber revolver, bearing serial number

CT88108, sold on May 24, 2016;

cc. a Romarm, Romak 991, 7.62x39mm assault rifle, bearing serial number 1-04898-99, sold on or about June 1, 2016; and

dd. a Chinese, Type 56, SKS, 7.62x39mm assault rifle, with an obliterated serial number, sold on or about June 3, 2016.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO: **(21 U.S.C. § 846 -- Conspiracy to Distribute Cocaine Base and Cocaine)**

The Grand Jury charges that:

3. From a time unknown to the Grand Jury and continuing until on or about June 8, 2016, in the District of Massachusetts, and at other places presently known and unknown:

4. **LESTER MARTINEZ**, a/k/a "Chapin,"
5. **JOSE PINEDA RAMIREZ**,
a/k/a "Lil Joker,"
8. **LUIS SERRANO**, a/k/a "Catracho," a/k/a
"Cheeky,"
10. **CRISTIAN VELASQUEZ**, a/k/a "Bombio" and
11. **OMAR VILLEGAS**, a/k/a "Negrito,"

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other persons known and unknown to the Grand Jury, to distribute, and to possess with intent to distribute, cocaine, a Schedule II controlled substance, and cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The Grand Jury further charges that the conspiracy described herein involved 28 grams of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii). Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(iii), is applicable to this count.

5. The Grand Jury further charges that 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, are attributable and were reasonably foreseeable to defendants **(4) LESTER MARTINEZ**, **(5) JOSE PINEDA RAMIREZ**, **(8) LUIS SERRANO**, **(10) CRISTIAN VELASQUEZ**, and **(11) OMAR VILLEGAS**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(iii), is applicable

to this count as to these three defendants.

All in violation of Title 21, United States Code, Sections 846.

COUNT THREE: (21 U.S.C. § 841(a)(1) --Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury charges that:

6. On or about August 28, 2015, in the District of Massachusetts,

1. OSCAR OLIVA, a/k/a "Droopy,"

the defendant herein, did knowingly and intentionally possess with intent to distribute and distribute cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) .

COUNT FOUR: **(18 U.S.C. § 922(g)(1) -- Felon in Possession of a Firearm)**

The Grand Jury further charges that:

7. On or about April 25, 2016, at Chelsea, in the District of Massachusetts,

1. **OSCAR OLIVA, a/k/a "Droopy,"**

the defendant herein, having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, to wit: an Armscor, 1911, .45 caliber semi-automatic pistol, bearing serial number CD008791.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE: **(18 U.S.C. § 922(g)(5) -- Alien in Possession of a Firearm)**

The Grand Jury further charges that:

8. On or about April 29, 2015, at Revere, in the District of Massachusetts,

3. **JAMIR CHICAS-HERNANDEZ,**

the defendant herein, who is illegally and unlawfully in the United States, did knowingly possess in and affecting commerce a firearm, to wit: a Ruger, Blackhawk, .357 Magnum revolver, bearing serial number 33-56967.

All in violation of Title 18, United States Code, Section 922(g)(5).

COUNT SIX: **(18 U.S.C. § 922(g)(1) -- Felon in Possession of a Firearm)**

The Grand Jury further charges that:

9. On or about March 14, 2016, in the District of Massachusetts,

8. **LUIS SERRANO**, a/k/a "Catracho," a/k/a "Cheeky,"

the defendant herein, having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, to wit: an Armscor, M200, .38 caliber revolver, with an obliterated serial number.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN: **(18 U.S.C. § 922(g)(5) -- Alien in Possession of a Firearm)**

The Grand Jury further charges that:

10. On or about July 27, 2015, at Chelsea, in the District of Massachusetts,

10. **CRISTIAN VELASQUEZ, a/k/a "Bombio,"**

the defendant herein, who is illegally and unlawfully in the United States, did knowingly possess
in and affecting commerce a firearm, to wit: a High Point, .45 caliber semi-automatic pistol,
bearing serial number X4203573.

All in violation of Title 18, United States Code, Section 922(g)(5).

COUNT EIGHT: (18, U.S.C. § 922(k) – Possession of a Firearm with an Obliterated Serial Number)

The Grand Jury further charges that:

11. On or about May 9, 2015, at Chelsea, in the District of Massachusetts,

9. **BRIAN SEGURA,**

the defendant herein, did knowingly possess a firearm, to wit a SCCY, CPX-1, 9mm semi-automatic pistol, which had the importer's and manufacturer's serial number removed, obliterated and altered, and which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(k).

COUNT NINE: **(26 U.S.C. § 5861(d) -- Possession of a Sawed-off Shotgun;
18 U.S.C. § 2 -- Aiding and Abetting)**

The Grand Jury further charges that:

12. On or about October 4, 2015, in Chelsea, and elsewhere, in the District of Massachusetts,

7. **JOSE RAMOS RIVERA, a/k/a "Pumba," and**
11. **OMAR VILLEGRAS, a/k/a "Negrito,"**

the defendants herein, knowingly possessed a firearm, that is a Mossberg, 600AT, 12 gauge, shotgun having a barrel of less than 18 inches in length, not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d) and Title 18, United States Code, Section 2.

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further charges that:

13. Upon conviction of any offenses alleged in Counts Two and Three of this indictment:

1. **OSCAR OLIVA, a/k/a "Droopy,"**
4. **LESTER MARTINEZ, a/k/a "Chapin,"**
5. **JOSE PINEDA RAMIREZ,**
a/k/a "Lil Joker,"
8. **LUIS SERRANO, a/k/a "Catracho," a/k/a
"Cheeky,"**
10. **CHRISTIAN VELASQUEZ,**
a/k/a "Bombio," and
11. **OMAR VILLEGAS, a/k/a "Negrito,"**

the defendants herein, shall forfeit to the United States, jointly and severally, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations; and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

14. If any of the property described in paragraph 13, above, as a result of any act or omission of the defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 16 above.

All pursuant to Title 21, United States Code, Section 853.

FIREARM FORFEITURE ALLEGATION
(18 U.S.C § 924(d) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

15. Upon conviction of any offenses alleged in Counts One, Four, Five, Six, Seven,

Eight and Nine of this indictment:

1. **OSCAR OLIVA**, a/k/a “Droopy,”
2. **RALPH BONANO**,
3. **JAMIR CHICAS-HERNANDEZ**,
4. **LESTER MARTINEZ**, a/k/a “Chapin,”
5. **JOSE PINEDA RAMIREZ**,
a/k/a “Lil Joker,”
6. **DENNIS PLEITES RAMOS**,
7. **JOSE RAMOS RIVERA**, a/k/a “Pumba,”
8. **LUIS SERRANO**, a/k/a “Catracho,” and
“Cheeky,”
9. **BRIAN SEGURA**,
10. **CRISTIAN VELASQUEZ**,
a/k/a “Bombio,” and
11. **OMAR VILLEGAS**, a/k/a “Negrito,”

the defendants herein, shall forfeit to the United States, any firearms or ammunition involved in or used in any knowing commission of the offense, including, but not limited to, the following:

- a. Smith and Wesson, .357 Magnum revolver with an obliterated serial number;
- b. a Ruger, New Model Blackhawk, .357 Magnum revolver, bearing serial number 33-56967;
- c. a SCCY, CPX-1, .9mm semi-automatic pistol, with an obliterated serial number;
- d. an Intratec, Tec-9, .9mm pistol, with an obliterated serial number;
- e. a Remington, 12 gauge, double-barrel shotgun, bearing serial number 57262;
- f. a Taurus, PT111 G2, 9mm semi-automatic pistol, with an obliterated serial number;

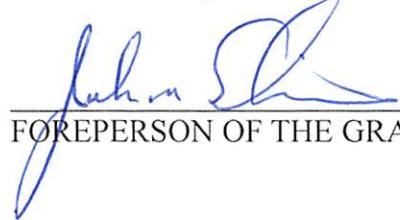
- g. an H&R Inc., Model 676, .22 caliber revolver, bearing serial number 7AT070686;
- h. a Ruger, 22/45 MKIII, .22 caliber semi-automatic pistol, bearing serial number 274-85425;
- i. a Bryco Arms, Bryco38, .380 caliber semi-automatic pistol, with an obliterated serial number;
- j. a Helwan Brigadier, 1951, .9mm semi-automatic pistol, bearing serial number 11202;
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- m. a Smith and Wesson, Regulation Police, .32 caliber revolver with an obliterated serial number;
- n. an Ortgies, .32 caliber semi-automatic pistol, bearing serial number 60023;
- o. a HiPoint, .45 caliber semi-automatic pistol, bearing serial number X4203573;
- p. a Mauser, 7.65mm semi-automatic pistol, bearing serial number 317519, a Remington, Model 740, .308 caliber rifle, bearing serial number 153250, and JC Higgins, Model 5833, 20 gauge shotgun;
- q. a Hatson Arms, Escort, 12 gauge, pump-action shotgun, bearing serial number 186281;
- r. a Sig Sauer, Model SP2022 .9mm, semi-automatic pistol, bearing serial number 249133767;
- s. a Mossberg, 600AT, 12 gauge, sawed-off shotgun, with an obliterated serial number, and a Remington, Model 870, Wingmaster, 12 gauge shotgun, bearing serial number 352474V;
- t. a High Point, Model CF380, .380 caliber semi-automatic pistol, bearing serial number P889460;
- u. a Walther, P38, .9mm semi-automatic pistol, bearing serial number 212803, and a Smith and Wesson, SW9VE, .9mm semi-automatic pistol, bearing serial number DXAS004;
- v. a Smith and Wesson, Model 17, .22 caliber revolver, bearing serial number K96273, and a Smith and Wesson, Regulation Police, .32 caliber revolver, bearing serial number

527363;

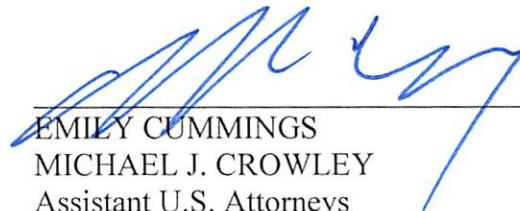
- w. a Bryco Arms, Model Jennings Nine, 9mm semi-automatic pistol, bearing serial number 1459175;
- x. an Armscor, M200, .38 caliber revolver with an obliterated serial number;
- y. an Armscor, 1911, .45 caliber, semi-automatic pistol bearing serial number CD008791;
- z. a Davis Industries, P380, .380 caliber semi-automatic pistol, bearing serial number AP449597;
- aa. a Smith and Wesson, .38 Special snub-nose revolver, bearing serial number C56093;
- bb. a Taurus, Revolver Model 851, .38 caliber revolver, bearing serial number CT88108;
- cc. a Romarm, Romak 991, 7.62x39mm assault rifle, bearing serial number 1-04898-99; and
- dd. a Chinese, Type 56, SKS, 7.62x39mm assault rifle, with an obliterated serial number.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL,



FOREPERSON OF THE GRAND JURY



EMILY CUMMINGS
MICHAEL J. CROWLEY
Assistant U.S. Attorneys

DISTRICT OF MASSACHUSETTS

June 8, 2016

Returned into the District Court by the Grand Jurors and filed.



18:03 pm
Deputy Clerk